

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

IN RE THE APPLICATION OF
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS FOR
ACCESS TO CERTAIN SEALED
COURT RECORDS

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Case No.: 1:17-cv-00169

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MOTION TO UNSEAL

The United States of America, by undersigned counsel, hereby submits this Motion to Unseal and states as follows:

1. On January 23, 2017, the Reporters Committee for Freedom of the Press (the “Applicant”) filed an application for public access to certain sealed court records in which it seeks an order from this Court unsealing certain court records related to the United States government’s completed criminal investigation and prosecution of Thomas Andrews Drake. Appl. (ECF No. 1). On or about that same day, as per Applicant’s counsel’s certificate of service, a copy of the Application together with a copy of the supporting Memorandum of Points and Authorities (ECF No. 2) was received by counsel for the United States of America.

2. Since then, the United States of America has been working diligently to identify, gather, and review relevant documents, dockets, and information responsive to the Application, and prepare a response to the same.

3. The United States of America has identified several affidavits and search warrants responsive to the Application. Those affidavits and search warrants were filed under seal in this Court under the miscellaneous case numbers identified in Exhibit 1, filed under seal.

4. In its Application, the Reporters Committee requests to unseal the entire dockets in the relevant matters. Because the dockets are sealed, however, the United States does not have

access to the dockets and the totality of documents filed in each matter. Before it can respond to the Applicant's request to unseal the entire dockets, the United States requires an opportunity to review all documents filed in the miscellaneous matters to confirm the dockets are responsive to the Application and, among other things, to determine whether any information contained therein requires redaction. The United States accordingly requests that this Court unseal the dockets in the matter numbers identified in Exhibit 1 for the limited purpose of permitting the United States to review the dockets and all documents filed in those matters.

WHEREFORE, based on the foregoing, the United States of America respectfully requests that this Court grant this Motion to Unseal, and issue an order unsealing the dockets in the miscellaneous matters identified in Exhibit 1, filed under seal, for the limited purpose of permitting the United States to review all documents filed in those matters to, among other things, confirm that they are responsive to the Application and determine whether any information contained therein requires redaction, such that it may completely and meaningfully respond to the Reporters Committee's Application.

Respectfully submitted,

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/s/
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 8th day of May 2017, a copy of the foregoing Motion to Unseal was electronically filed and served on all counsel of record.

/s/

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